

My name is Erik Anderson, and I strongly support actions the Federal Communications Commission can take to expand and support the Low Power FM radio service.

Issue 1: 3rd Adjacent Channel and non-Primary Status

Imagine investing approximately \$10,000 in a “new business.” The first year, you labor hard, and do not recover your investment cost without drawing any form of income to support your family. The second year, you still have not recovered your investment, but you start to compensate yourself at a whopping \$200/wk (\$10,400 annually). You put 20-60 hours each week into the business, with the stated purpose of reaching out to the community.

Then, you look up, and a corporate giant relocates their business to a location many miles from you. However, due to federal regulations of the FCC, their relocation may force your business to shut down. No compensation for your years of labor. No ability to relocate your business. Just shut down and count your losses.

Sounds like a corporate takeover, doesn't it?

This is the current situation with WWTL-LP in Logan, Ohio. Radio giant Clear Channel has petitioned the FCC to relocate WMRN-FM and WSRW-FM. As a result, Clear Channel is closer to the valuable Columbus, OH market. But at the same time, local radio 106.7 could be knocked off the air, located in a rural, non-suburb, one and one-half hours from the WMRN site. An area that while WMRN would “serve,” it would not “service.” There would no longer be a station that provides the local beat for Logan, OH; just a corporate-run machine telling the folks of Logan more about what is going on in Columbus.

And just down the road, another station, WEAKE-LP in Athens, Ohio also faces problems.

The worst part is: this is not an isolated case study. This is the reality for WWTL-LP and many other LPs around the nation.

I urge the FCC: Do not allow LPFMs to be bumped off the air by a full-power. Provide primary status. Please give priority to LPFM stations over translator stations when assigning frequencies.

At a minimum, the FCC should guarantee the LPFM another frequency (even something at the bottom of the band).

In addition, the LPFM should be compensated by the full-power for engineering and marketing costs associated with changing frequencies (\$5,000 – \$20,000). Multi-million dollar stations can consider this cost while evaluating the Return on Investment associated with their station changes. At the same time, this nominal amount for these large corporations will dramatically impact little, non-profit, community-based stations. This nominal \$5,000 - \$20,000 would allow for the community station to re-tune their transmitters, purchase the new tuned antenna that will be required, pay engineers to hang them, change the lettering on their van, change the sign on their door and reprint their printed promotional materials. Costs for voice talent for station imaging, sweepers, station IDs would also be incurred (often costing \$2,000 per project). In an open-market environment, arbitrators would find this reimbursement reasonable. The FCC should legislate this reasonable reimbursement.

Issue 2: Ownership Restrictions

The FCC should expand the definition of local ownership. A slightly larger geography should be considered, but 100% of ownership should fall into this geography.

Allow the owners of LPFM to own multiple LPFMs, so long as 100% of the owners live within 25 miles of the said stations. Some local communities are rural and geographically dispersed. If a second frequency is available, these stations should be able to own multiple stations and rebroadcast the signal. This will permit airing “County Fairs” throughout the county, Football Games for the geography that serves the entire high school population, and Local Obituaries to all family members in the community.

Lastly, the FCC should enforce compliance and when fraudulent

conditions exist, the station license should be revoked.

Regarding transfer of ownership, please allow LPFMs to buy and sell their license to existing LPFM owners or new FCC approved owners. In the event a station finds they cannot afford to operate or experiences a devastating loss of a crucial staff member, they should have the ability to recover investment expense while allowing for the community to maintain its local radio station.

Issue 3: LP-500

The original concept of an LP-1000 should be considered. I recommend LP500 as it would bring service to an entire small community without the use of multiple LP stations or translators. The LP100 class works well for a university setting, but most of these licenses are in small communities where 100W simply does not cover rural setting.

Issue 4: Commercial and Non-Commercial

The FCC should consider allowing LP stations to function as either commercial or non-commercial. Small communities have small pocket books. Unfortunately, most businesses do not value sponsorship acknowledgments as much as they value advertisements. Why is it that LPs are most often available in small markets? Because full-power stations are interested in big markets. Why? Because money is most prominent in the large markets. Please lift this regulation to enable LP stations to better tap into the limited financial resources that small communities tend to have, in the event an LP considers this to be the best way to reach their market.

After attending LPFM seminars, being a part of email groups, and discussions with other LPFM stations, I have concluded that most stations do not have the financial support needed. Most stations receive less than \$1,500 per month in financial support. Less than a handful of stations have \$10,000 per month of financial support. I am not aware of a single station that has achieved \$250,000 of annual support. If the FCC supports the purpose of LPFM to provide local programming, a revenue stream is needed to support it where the average station can achieve \$10,000 per month in support.

Conclusion:

I applaud the FCC for recognizing the need for LPFM. I strongly encourage the bureau to take the said actions to provide for and protect the vision from which LPFM was birthed.

Thank you,

Erik Anderson

106.7 WWTL-LP

15024 St Rte 328

Logan, OH 43138

740-380-1616